

From: [Blair Bowie](#)
To: [Zachary L. Barker](#); [Andrew Coulam](#); [Dawn Jordan](#); [David M. Rudolph](#); [Robert W. Wilson](#)
Cc: [keeda@freeheartsorg.com](#); [Danielle Lang](#); [Aseem Mulji](#); [Alice Huling](#); [Grant, Charles](#); [Grant, Denmark](#); [ptelfeyan@equaljusticeunderlaw.org](#); [Kate Uyeda](#); [Ellen Boettcher](#); [Valencia Richardson](#)
Subject: Re: NAACP v. Lee - Letter on Supplemental Productions
Date: Friday, October 6, 2023 2:49:35 PM

Understood. Thank you.

From: Zachary L. Barker <Zachary.Barker@ag.tn.gov>
Sent: Friday, October 6, 2023 1:04 PM
To: Blair Bowie <BBowie@campaignlegalcenter.org>; Andrew Coulam <Andrew.Coulam@ag.tn.gov>; Dawn Jordan <Dawn.Jordan@ag.tn.gov>; David M. Rudolph <David.Rudolph@ag.tn.gov>; Robert W. Wilson <Robert.Wilson@ag.tn.gov>
Cc: [keeda@freeheartsorg.com](#) <keeda@freeheartsorg.com>; Danielle Lang <dlang@campaignlegalcenter.org>; Aseem Mulji <amulji@campaignlegalcenter.org>; Alice Huling <AHuling@campaignlegalcenter.org>; Grant, Charles <cgrant@bakerdonelson.com>; Grant, Denmark <DGrant@bakerdonelson.com>; [ptelfeyan@equaljusticeunderlaw.org](#) <ptelfeyan@equaljusticeunderlaw.org>; Kate Uyeda <kuyeda@campaignlegalcenter.org>; Ellen Boettcher <boettcher@campaignlegalcenter.org>; Valencia Richardson <VRichardson@campaignlegalcenter.org>
Subject: RE: NAACP v. Lee - Letter on Supplemental Productions

Blair,

We will make an effort to respond to Number 6 in 7 days, but my expectation is that it will take a bit longer. I'll be happy to provide you with an update on where we are on that issue next Friday.

One other note. I want to clarify that something for number 5. We agreed that we will produce at least some of the emails that were marked privileged, but we did not state that they "should have been produced." I don't want to sound too nitpicky, but I just want to make sure that we are on the same page.

My Best,

Zachary L. Barker | Assistant Attorney General
Public Interest Division
Office of the Tennessee Attorney General
P.O. Box 20207, Nashville, TN 37202-0207
Phone: (615) 532-4098
Zachary.Barker@ag.tn.gov



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From: Blair Bowie <BBowie@campaignlegalcenter.org>
Sent: Friday, October 6, 2023 11:49 AM
To: Zachary L. Barker <Zachary.Barker@ag.tn.gov>; Andrew Coulam <Andrew.Coulam@ag.tn.gov>; Dawn Jordan <Dawn.Jordan@ag.tn.gov>; David M. Rudolph <David.Rudolph@ag.tn.gov>; Robert W. Wilson <Robert.Wilson@ag.tn.gov>
Cc: keeda@freeheartsorg.com; Danielle Lang <dlang@campaignlegalcenter.org>; Aseem Mulji <amulji@campaignlegalcenter.org>; Alice Huling <AHuling@campaignlegalcenter.org>; Grant, Charles <cgrant@bakerdonelson.com>; Grant, Denmark <DGrant@bakerdonelson.com>; ptelfyan@equaljusticeunderlaw.org; Kate Uyeda <kuyeda@campaignlegalcenter.org>; Ellen Boettcher <eboettcher@campaignlegalcenter.org>; Valencia Richardson <VRichardson@campaignlegalcenter.org>
Subject: Re: NAACP v. Lee - Letter on Supplemental Productions

We would prefer if you can make your updates to the privilege log at the same time, so would ask that you aim to have those done on the same timeline as 4 and 5, if possible.

From: Zachary L. Barker <Zachary.Barker@ag.tn.gov>
Sent: Friday, October 6, 2023 12:43 PM
To: Blair Bowie <BBowie@campaignlegalcenter.org>; Andrew Coulam <Andrew.Coulam@ag.tn.gov>; Dawn Jordan <Dawn.Jordan@ag.tn.gov>; David M. Rudolph <David.Rudolph@ag.tn.gov>; Robert W. Wilson <Robert.Wilson@ag.tn.gov>
Cc: keeda@freeheartsorg.com <keeda@freeheartsorg.com>; Danielle Lang <dlang@campaignlegalcenter.org>; Aseem Mulji <amulji@campaignlegalcenter.org>; Alice Huling <AHuling@campaignlegalcenter.org>; Grant, Charles <cgrant@bakerdonelson.com>; Grant, Denmark <DGrant@bakerdonelson.com>; ptelfyan@equaljusticeunderlaw.org <ptelfyan@equaljusticeunderlaw.org>; Kate Uyeda <kuyeda@campaignlegalcenter.org>; Ellen Boettcher <eboettcher@campaignlegalcenter.org>; Valencia Richardson <VRichardson@campaignlegalcenter.org>
Subject: RE: NAACP v. Lee - Letter on Supplemental Productions

Blair,

From my notes, I have that we requested two weeks from today to get you the information on Number 6. Will that work?

My Best,

Zachary L. Barker | Assistant Attorney General
Public Interest Division
Office of the Tennessee Attorney General
P.O. Box 20207, Nashville, TN 37202-0207
Phone: (615) 532-4098
Zachary.Barker@ag.tn.gov



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From: Blair Bowie <BBowie@campaignlegalcenter.org>

Sent: Friday, October 6, 2023 11:32 AM

To: Andrew Coulam <Andrew.Coulam@ag.tn.gov>; Zachary L. Barker <Zachary.Barker@ag.tn.gov>; Dawn Jordan <Dawn.Jordan@ag.tn.gov>; David M. Rudolph <David.Rudolph@ag.tn.gov>; Robert W. Wilson <Robert.Wilson@ag.tn.gov>

Cc: keeda@freeheartsorg.com; Danielle Lang <dlang@campaignlegalcenter.org>; Aseem Mulji <amulji@campaignlegalcenter.org>; Alice Huling <AHuling@campaignlegalcenter.org>; Grant, Charles <cgrant@bakerdonelson.com>; Grant, Denmark <DGrant@bakerdonelson.com>; ptelfeyan@equaljusticeunderlaw.org; Kate Uyeda <kuyeda@campaignlegalcenter.org>; Ellen Boettcher <eboettcher@campaignlegalcenter.org>; Valencia Richardson <VRichardson@campaignlegalcenter.org>

Subject: Re: NAACP v. Lee - Letter on Supplemental Productions

Counsel,

Thank you for joining the meet and confer this morning. This email will memorialize what we discussed.

1. Approval/ Denial files: you agreed that the entire files should have been produced and will provide complete productions, including any additional documents that have been created since the last supplement, on or before Oct. 20.
2. Potentially incomplete email chains: you will review the examples we sent for additional emails and if it appears that emails may have been left out, review all relevant communications to ensure that they are produced. You will produce those in two weeks on or before Oct. 20.
3. Redactions: you agreed that personal information need not be redacted due to the protective order and will provide unredacted documents in two weeks on or before Oct. 20.
4. Privilege log: You will break the privilege log into individual emails, specifying the senders, recipients, and cc-ed contacts, and which emails in the chain you are asserting privilege over and why.
5. Reviewing emails for privilege - You agreed that at least some of the emails that were marked as privileged appear that they should be produced. You are reviewing the emails we have specified, as well as any that may have been marked privileged simply due to the inclusion or copying of in-house counsel, for whether they actually seek legal advice. You will produce non-privileged emails and update the privilege log accordingly

in 7 days, on or before Oct. 13.

6. You requested that we provide the Bates stamp for the email described that was produced. It is **DEF 1425-27**. I suggested that you may have overlooked these documents if you did not review Spenser Jones' emails and asked that you review Mr. Jones' emails for responsive documents. You asked us to provide the RFPs to which we believe these emails would be responsive. **One RFP to which these would be directly responsive is No. 11 in Plaintiffs' second set of RFPs - specifically, No. 11(C). They are also responsive to RFPs 1 and 2 in that same set of RFPs.** You also suggested you may assert some sort of privilege over these documents. We did not discuss a timeline for action, but we ask that you provide these emails and/or an updated privilege log including within 7 days, on or before Oct. 13.

Please let me know if any of the above does not comport with your understanding of our conversation.

Best,
Blair